

Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of)	
)	
Amendment of Part 97 of the Commission's)	RM-10413
Amateur Service Rules Governing)	
Operating Privileges)	
)	

PERSONAL COMMENTS OF HANS BRAKOB, K0HB

OVERVIEW

These comments are in response to the ARRL proposal for "refarming" the existing HF "Novice sub-bands".

I. Discussion:

The ARRL petition does not address the implementation of new technologies as repeatedly requested by the Commission in WT Docket 98-143. It simply proposes to eliminate the Novice segments and reshuffle that spectrum among existing legacy modes. Rather than gain consensus, the ARRL polling method produced a popularity poll among several non-responsive (to 98-143) choices.

Rather than just "more of the same old stuff", I propose that the Commission take this opportunity to provide the Amateur Radio service with a new incentive to concentrate on paragraph 97.1(b) of the Commission's Rules.

97.1(b) Continuation and extension of the amateur's proven ability to contribute to the advancement of the radio art.

While I agree that the declining Novice license population no longer justifies several significant chunks of spectrum as a "reservation" for improving their Morse skills, and that these "reservations" have outlived their regulatory purpose, I propose that we retain these 50-year old "reservations" and convert them to a new purpose which will ensure the future Amateur Radio service continues our "proven ability to contribute to the advancement".

II Proposal:

- A. To "de-populate" the current Novice segments, I propose that all Novice (and Technician with code credit) licensees be authorized to use Morse code in the same band segments now authorized for General class licensees.

- B. I propose that the current Novice sub-bands be set aside as a new "Experimental Reservation" for non-traditional and experimental modes such as digitized voice, digitized image, and other "forward looking" communications methods.
- C. I propose that the current power output level of 200W be retained for those segments, and additionally propose that transmitters in those segments must be equipped with auto-adaptive circuitry to reduce output to the lowest level consistent with reliable communications.
- D. I recommend that the Commission grant broad discretion to amateurs operating in this "experimental reservation" as to innovative modulation schemes and non-traditional technologies.

Respectfully submitted,

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this is the same comment as submitted by:

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which I think is a good idea.

Robert Casey